NORTH CAROLINA DIVISION OF AIR QUALITY

Air Permit Review

Permit Issue Date:

Region: Washington Regional Office
County: Beaufort
NC Facility ID: 0700122
Inspector's Name: Steven Daniels
Date of Last Inspection: 09/23/2015
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): Fountain Powerboats

Facility Address:
Fountain Powerboats
1653 Whichards Beach Road SR 1166
Washington, NC 27889

SIC: 3732 / Boat Building And Repairing
NAICS: 336612 / Boat Building

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP:
NSPS:
NESHAP:
PSD:
PSD Avoidance:
NC Toxics:
112(r):
Other:

Contact Data

Facility Contact	Authorized Contact	Technical Contact
David Hardison Vice President of Engineering (252) 975-7009 1653 Whichards Beach Road SR 1166 Washington, NC 27889	David Hardison Vice President of Engineering (252) 975-7009 1653 Whichards Beach Road SR 1166 Washington, NC 27889	Paul Zawila Senior Environmental Engineer (803) 548-6492 3444 Pickney Bluff Fort Mill, SC 29715

Application Data

Application Number: 0700122.14A
Date Received: 08/29/2014
Application Type: Renewal
Application Schedule: TV-Renewal

Existing Permit Data
Existing Permit Number: 06175/T11
Existing Permit Issue Date: 06/15/2010
Existing Permit Expiration Date: 05/31/2015

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	---	---	12.92	---	0.1500	8.96	5.84 [Styrene]
2013	---	---	7.00	---	0.1100	5.19	4.58 [Styrene]
2012	---	---	1.01	---	0.0100	0.6133	0.4778 [Styrene]
2011	---	---	18.87	---	0.3100	14.54	13.27 [Styrene]
2010	---	---	8.72	---	0.1300	7.44	6.51 [Styrene]

Review Engineer: Jenny Sheppard

Review Engineer's Signature: **Date:**

Comments / Recommendations:
Issue 06175/T12
Permit Issue Date:
Permit Expiration Date:

1. Purpose of Application:

Fountain Power Boats is currently operating under permit 06175T11 issued on June 15, 2010. The current permit expired May 31, 2015. The renewal application was received on August 29, 2014, nine months prior to the expiration date. The existing permit will continue to be effective beyond May 31, 2015 until the issuance of this permit renewal pursuant to 15A NCAC 2Q .0513.

2. Facility Description

Fountain Power Boats is a boat manufacturing facility.

3. Application Chronology/History/Table of Changes

June 15, 2010	Renewal issued 06175T11 by Jenny Sheppard.
August 29, 2014	Application for renewal (Application No. – 0700122.14A) was received.
August 26, 2015	Inquired about MACT VVVV language changes to shorten the current condition in the renewal.

Table of Changes to Permit 06175T11

Page(s)	Section	Description of Change(s)
Cover	-	-amended all dates and permit revision numbers -updated language as per latest shell document
TOC	-	-updated shell titles
All	Header	-amended permit revision number
All	2.1	-updated monitoring/recordkeeping requirements for 2D .0515 and 2D .0521 throughout permit
All occurrences	2.1	-updated monitoring/recordkeeping requirement to current language and rule references
38-46	General Conditions	-updated general conditions as per latest shell language
47	List of Acronyms	-updated list to current

4. New Equipment/Change in Emission and Regulatory Review

No new equipment was added or changed during this review. No physical changes have been made at the Company since the last Title V permit was issued.

The facility is subject to the following regulations:

15A NCAC 2D .0512
15A NCAC 2D .0515
15A NCAC 2D .0521
15A NCAC 2Q .0711
15A NCAC 2D .0958
15A NCAC 2Q .0317 (PSD Avoidance)
15A NCAC 2D .1100
15A NCAC 2D .1111 (40 CFR 63, Subpart VVVV).
15A NCAC 2D .1806

Based on the facility's most recent permit revisions as well as recent compliance inspections performed by the Washington Regional office, this facility is considered to be in compliance with all applicable Air Quality regulations.

5. Stipulation Review:

15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

a. The Permittee shall comply with all applicable provisions, including the notification, testing, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 2D .1111

"Maximum Achievable Control Technology" as promulgated in 40 CFR Part 63, Subpart VVVV "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing," including Subpart A "General Provisions." [40 CFR §63.5683 and §63.5689]

Startup, Shutdown and Malfunction Provision [15A NCAC 02D .1109 112(j) Case-by-Case MACT]

b. During the periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the emission source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the Permittee reduce emissions from the above emission source to the greatest extent which is consistent with safety and good air pollution control practices.

Emission Limits for Open Molding Resin and Gel Coat Operations

c. The Permittee shall limit organic HAP emissions from any of the following open molding operations to the emission limit specified in paragraph d. below. Operations listed in paragraph e are exempt from this limit.
   i Production resin.
   ii. Pigmented gel coat.
   iii. Clear gel coat.
   iv. Tooling resin.
   v. Tooling gel coat.

d. The Permittee shall limit organic HAP emissions from open molding operations to the limit specified by Equation 1 of this condition below, based on a 12-month rolling average.

$$HAP\ Limit = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})] \quad \text{(Equation 1)}$$

Where: $HAP\ Limit$ = Total allowable organic HAP that can be emitted from the open molding operations, kilograms.

M_R = Mass of production resin used in the past 12 months, excluding any materials exempt under Section paragraph c above, in units of megagrams.

M_{PG} = Mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under paragraph c above, in units of megagrams.

M_{CG} = Mass of clear gel coat used in the past 12 months, excluding any materials exempt under paragraph c above, in units of megagrams.

M_T = Mass of tooling resin used in the past 12 months, excluding any materials exempt under paragraph c, above, in units of megagrams.

M_{TG} = Mass of tooling gel coat used in the past 12 months, excluding any materials exempt under paragraph c above, in units of megagrams.

e. The materials specified in i through iii below are exempt from the open molding emission limit specified in Section 2.2 B.1.d above.
   i. Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR Subchapter Q or the construction of small passenger vessels regulated by 46 CFR Subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. A record must be kept of the resins which are being used for this exemption.
   ii. Pigmented, clear, and tooling gel coat used for part or mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. A record must be kept of the amount of gel coats which are being used for this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.
   iii. Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis. A record must be kept of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used.

Complying with the Open Molding Emission Limit

f. The Permittee shall use one or more of the options listed in paragraphs i and ii below, to meet the emission limit in paragraphs c and d in this section for the resins and gel coats used in open molding operations at the facility.
   i. Maximum achievable control technology (MACT) model point value averaging (emissions averaging) option. Demonstrate that emissions from the open molding resin and gel coat operations that are averaged meet the emission limit in paragraphs c and d above using the procedures described in 40 CFR §63.5710. Compliance

with this option is based on a 12-month rolling average.

ii. Compliant materials option. Demonstrate compliance by using resins and gel coats that meet the organic HAP content requirements in Table 1 below. Compliance with this option is based on a 12-month rolling average.

Table 1: Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations **[40 CFR Part 63 Subpart VVVV, Table 2]**

For this operation -	And this application method -		You must not exceed this weighted-average organic HAP content (weight percent) requirement -
1. Production resin operations	Atomized (spray)		28 percent
2. Production resin operations	Nonatomized (nonspray)		35 percent
3. Pigmented gel coat operations	Any method		33 percent
4. Clear gel coat operations	Any method		48 percent
5. Tooling resin operations	Atomized (spray)		30 percent
6. Tooling resin operations	Nonatomized (nonspray)		39 percent
7. Tooling gel coat operations	Any method		40 percent

Demonstrating Compliance using Compliance Materials

g. For each open molding operation complying using the compliant materials option, the Permittee must demonstrate compliance by performing the steps in the following paragraphs i through iv:
   i. Use the methods specified in paragraphs h through k of this section to determine the organic HAP content of resins and gel coats.
   ii. Complete the calculations described in paragraph j below to show that the weighted-average organic HAP content does not exceed the limit specified in Table 1 above.
   iii. Keep records as specified in paragraphs (A) through (D) below for each resin and gel coat.
      (A) Hazardous air pollutant content.
      (B) Application method for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with nonatomized technology.
      (C) Amount of material used per month. This record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements.
      (D) Calculations performed, if required, to demonstrate compliance based on weighted-average organic HAP content as described in paragraphs h through k of this section.
   iv. Submit semiannual compliance reports to the Division as specified in paragraph aa of this section.

h. Compliance using the organic HAP content requirements listed in Table 1 "Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations," is based on a 12-month rolling average that is calculated at the end of every month. If the Permittee is using filled material (production resin or tooling resin), the Permittee must comply according to the procedure described paragraph l of this section. [40 CFR §63.5713(a)]

i At the end of the twelfth month after the Permittee's compliance date and at the end of every subsequent month, review the organic HAP contents of the resins and gel coats used in the past 12 months in each operation. If all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table 1, then the Permittee is in compliance with the emission limit specified in paragraph d for that 12-month period for that operation. In addition, the Permittee does not need to complete the weighted- average organic HAP content calculation contained in paragraph j for that operation. [40 CFR §63.5713(b)]

j. At the end of every month, the Permittee must use Equation 2 of this condition to calculate the weighted-average organic HAP content for all resins and gel coats used in each operation in the past 12 months.

$$\textit{Weighted-Average HAP Content}\ (\%) = \frac{\sum_{i=1}^{n} M_i HAP_i}{\sum_{i=1}^{n} M_i} \qquad \text{(Equation 2)}$$

Where: M_i = Mass of open molding resin or gel coat "i" used during the past 12 months in an operation, megagrams.

HAP_i = Organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation. Use the methods in paragraph x below to determine organic HAP content.

n = The number of different open molding resins or gel coats used during the past 12 months in an operation.

[40 CFR §63.5713(c)]

k. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit specified in Table 1, then the Permittee is in compliance with the emission limit specified in paragraph d. [40 CFR §63.5713(d)]

Demonstrating Compliance using Filled Resins

l. i. If the Permittee is using a filled production resin or filled tooling resin, the Permittee must demonstrate compliance for the filled material on an as-applied basis using Equation 3 of this condition.

$$PV_F = PV_U \frac{100 - \%Filler}{100} \qquad \text{(Equation 3)}$$

Where: PV_F = The as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.

PV_u = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in Table 3 "MACT Model Point Value Formulas for Open Molding Operations" as contained in 40 CFR Part 63, Subpart VVVV (repeated in paragraph h.iv, above, for convenience).

% Filler = The weight-percent of filler in the as applied filled resin system.

ii. If the filled resin is used as a production resin and the value of PV_F calculated by Equation 1 of paragraph j.i, above, does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

iii. If the filled resin is used as a tooling resin and the value of PV_F calculated by Equation 1 of paragraph j.i, above, does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance.

Standards for Resin and Gel Coat Mixing Operations

m. The Permittee shall cover at all times all resin and gel coat mixing containers with a capacity equal to or greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times.

n. The work practice standard in paragraph m above, does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

o. To demonstrate compliance with the work practice standard in paragraph m above, the Permittee must visually inspect all mixing containers subject to this standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

p. The Permittee must keep records of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

Standards for Resin and Gel Coat Application Equipment Cleaning Operations

q. For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), the Permittee must use a cleaning solvent that contains no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.

r. The Permittee must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters (2 gallons), the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR Part 63, Subpart T (National Emission Standards for Halogenated Solvent

Cleaning). Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

s. Determine and record the organic HAP content of the cleaning solvents subject to the standards specified in paragraphs q and r above, using the methods specified in paragraph x below.

t. If the Permittee recycles cleaning solvents on site, the Permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in paragraph x below demonstrating compliance with organic HAP content limits.

u. At least once per month, the Permittee must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

Demonstrating Compliance with Carpet and Fabric Adhesive Operations [40 CFR 63.5740]

v. The Permittee must use carpet and fabric adhesives that contain no more than 5 percent organic HAP by weight.

w. To demonstrate compliance with the emission limit in paragraph v above, you must determine and record the organic HAP content of the carpet and fabric adhesives using the methods in paragraph x below.

Methods for Determining Hazardous Air Pollutant Content [40 CFR 63.5758]

x. Determine the organic HAP content for each material used. To determine the organic HAP content for each material used in the Permittee's open molding resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations, the Permittee must use one of the options in paragraph i through vi.

   i. Method 311 (appendix A to 40 CFR Part 63). The Permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in (A) and (B) below, when determining organic HAP content by Method 311.

      (A) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR §1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the Permittee does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP the Permittee measures as a value truncated to four places after the decimal point (e.g., 0.1234).

      (B) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (e.g., 0.123).

   ii. Method 24 (Appendix A to 40 CFR Part 63). The Permittee may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.

   iii. ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins). The Permittee may use ASTM D1259-85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

   iv. Alternative method. The Permittee may use an alternative test method for determining mass fraction of organic HAP if the Permittee obtains prior approval by EPA Region IV. The Permittee must follow the procedure in 40 CFR §63.7(f) to submit an alternative test method for approval.

   v. Information from the supplier or manufacturer of the material. The Permittee may rely on information other than that generated by the test methods specified in paragraphs i through iv, above, such as manufacturer's formulation data, according to (A) through (C), below.

      (A) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR §1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the Permittee does not have to include it in the organic HAP total.

      (B) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the Permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs i through iv, above, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the Permittee must use the measured organic HAP content to determine compliance.

      (C) If the organic HAP content is provided as a single value, the Permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs i through iv, above, is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the Permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points

or more, then the Permittee must use the measured organic HAP content to determine compliance.

vi. Solvent blends. Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the Permittee may use the values for organic HAP content that are listed in Table 5 "Default Organic HAP Contents of Solvents and Solvent Blends" or Table 6 "Default Organic HAP Contents of Petroleum Solvent Groups" as contained in 40 CFR Part 63, Subpart VVVV. The Permittee may use Table 6 as contained in 40 CFR Part 63, Subpart VVVV, only if the solvent blends in the materials the Permittee use do not match any of the solvent blends in Table 5 as contained in 40 CFR Part 63, Subpart VVVV, and the Permittee knows only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 as contained in 40 CFR Part 63, Subpart VVVV, then the test results must be used for determining compliance.

Table 6 "Default Organic HAP Contents of Petroleum Solvent Groups"

Recordkeeping/Monitoring

y. The Permittee shall keep the following records:
   i. a copy of each notification and report that the Permittee submitted to comply with this subpart;
   ii. all documentation supporting any notification or report that the Permittee submitted; and
   iii. the total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the Permittee shall also record the amounts of each applied by atomized and nonatomized methods.

z. i. The records must be readily available and in a form so they can be easily inspected and reviewed.
   ii. The Permittee must keep each record for 5 years following the date that each record is generated.
   iii. The Permittee must keep each record on site for at least 2 years after the date that each record is generated. You can keep the records offsite for the remaining 3 years.
   iv. The Permittee can keep the records on paper or an electronic device.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these records are not maintained.

Reporting

aa. The Permittee shall submit a semiannual report, acceptable to the Regional Air Quality Supervisor, of the applicable reports specified in paragraph bb below. The report must cover the applicable semiannual reporting period from January 1st through June 30th or from July 1st through December 31st, and must be postmarked no later than 60 calendar days after the end of the semiannual reporting period.

bb. The compliance report shall include the following information:
   i. Company name and address;
   ii. A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report;
   iii. The date of the report and the beginning and ending dates of the reporting period;
   iv. A description of any changes in the manufacturing process since the last compliance report;
   v. A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which the facility is complying. The statement or table shall also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period;
   vi. If the facility was in compliance with the emission limits and work practice standards during the reporting period, the Permittee shall include a statement to that effect; and
   vii. If the Permittee deviated from an emission limit or work practice standard during the reporting period, the he shall also include the following information in the semiannual compliance report:
      A. A description of the operation involved in the deviation,
      B. The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation,
      C. A description of any corrective action the Permittee took to minimize the deviation and actions he has taken to prevent it from happening again, and
      D. A statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

cc. The Permittee may switch between the compliance options (i.e. emissions averaging and compliant materials) in 40 CFR Part 63, Subpart VVVV per the requirements of paragraphs i. and ii below. In all cases, the Permittee shall

submit notification to change options, in writing, to the Division of Air Quality, 15 days prior to changing compliance options.

i. Changing from compliant materials (40 CFR §63.5713) to 12-month emissions averaging (40 CFR §63.5710): The Permittee shall begin collecting resin and gel coat usage data on the date the compliance option is switched. The source shall demonstrate compliance using the emissions averaging option for at least 12 consecutive months.

ii. Changing from 12-month emissions averaging (40 CFR §63.5710) to compliant materials (40 CFR §63.5713): The Permittee shall begin complying with the compliant materials option on the date the compliance option is switched. Until the full 12-month compliance period has ended the Permittee shall continue to collect resin and gel coat usage data and calculate the 12-month emissions average.

This permit contains compliance certification, monitoring, reporting, and record keeping requirements sufficient to assure compliance with the terms and conditions of this permit. All submittals required by these conditions shall be sent to the North Carolina Division of Air Quality at the following address:

North Carolina Division of Air Quality
Washington Regional Office
943 Washington Square Mall
Washington, NC 27889

6. NSPS Issues:

This facility is not currently subject to any NSPS regulations.

7. PSD/NAA Issues:

This facility is PSD Minor. Beaufort County has been triggered for PSD increment tracking for PM10 and SO2, however, this renewal does not affect PSD increment tracking. Beaufort County is in an attainment area and NAA does not apply.

8. MACT Issues:

This facility is subject to 40 CFR 63, Subpart VVVV (Boat Manufacturing MACT).

9. 112(r) Issues:

This facility is not subject to 112(r).

10. CAM Issues:

This facility is not subject to CAM.

11. Facility Wide Air Toxic Air Pollutants:

This renewal did not trigger toxics review. However, the facility was required to give a toxics compliance demonstration as Subpart VVVV is their last applicable MACT. The facility has previously satisfied their last MACT demonstration.

12. Facility Compliance Status/Compliance History:

The facility was last inspected on September 23, 2015 by Steven Daniels of the Washington Regional Office and found to be in compliance at the time of the inspection.

13. Public Notice / EPA and Affected State(s) Review

A notice of the draft Title V Permit was placed on the DAQ website. The notice provided for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice were sent to persons on the Title V mailing list and EPA. ***TO BE COMPLETED AFTER PUBLIC NOTICE(No additional comments were received.)***

Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. ***TO BE COMPLETED AFTER PUBLIC NOTICE (No additional comments were received)***. Also pursuant to 2Q .0522, a notice of the draft Title V Permit was provided to each affected State at or before the time notice provided to the public.

14. Conclusions, Comments, and Recommendations:

A professional engineer's seal was not required for this renewal Title V permit.

A consistency determination was not required for this renewal Title V permit.

WaRO recommends issuance of Permit No. 06175T12.

Recommend issuance of Permit No. 06175T12.